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December 15, 2006

The Honorable Kent A. Jordan  
U.S. District Court  
Lock Box 10  
844 N. King Street, Room 4209  
Wilmington, DE 19801

RE: Crother v. Dewey Beach  
Our File No.: 13061-00368  
C.A. # 04-913

Dear Judge Jordan:

The undersigned attorney represents defendants and plaintiffs are represented by James Liguori, Esq. in the above referenced matter. I write on behalf of all the parties to request a brief extension of time for the filing of Dispositive and Daubert Motions from the current due date of Friday, December 22, 2006 to Monday, January 8, 2007. Counsel have pursued discovery in this case diligently, including paper discovery and the depositions of all parties, with the exception of one party, namely, defendant, John Wheatley. Mr. Wheatley is currently enrolled in the State Police Academy to become a State Trooper in the State of Maryland. The parties had planned to conduct his deposition this weekend, which is the only time that he is available given the rigorous scheduling requirements of the State Police Academy. Unfortunately, plaintiffs' attorney, Jim Liguori has been called to California this weekend to attend the funeral of a close friend. In addition, the parties wish to conclude settlement discussions in this case, which actually involves four (4) plaintiffs in three (3) separate incidents under one case caption. The parties do not seek a change in any other deadline or due date under the current Case Scheduling Order. The parties respectfully submit the enclosed Stipulation for Your Honor's approval.

On behalf of all parties, I thank Your Honor for consideration of this request.

Very truly yours,

/s/ Kevin J. Connors

Kevin J. Connors

KJC/vll

Enclosure

cc: Clerk of the Court  
James E. Liguori, Esquire

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